

REMARKS

Claims 1-22 are pending in the application. Claims 1-22 are currently amended.

Applicant respectfully submits that entry of the currently amended claims is proper because the currently amended claims will either place the application in condition for allowance or in better form for appeal. Applicant further respectfully submits that no new matter is added to the currently amended claims.

Claims 1-22 stand rejected under 35 U.S.C. §102(e) as anticipated by U.S. Patent Application Publication No. 2004/0140956 to Kushler et al., hereinafter, Kushler.

Applicants respectfully traverse these rejections based on the following discussion.

I. The 35 U.S.C. 102(e) Rejection as Anticipated by Kushler

1. The Kushler Disclosure

Kushler discloses that "[t]he system of the present invention allows the user to input a word of text without having to set the stylus down on the screen to contact an intended letter and then lift the stylus from the screen again before contacting the next letter – i.e., without having to "tap" each letter. [emphasis added] This enables the user to input text much more quickly, since the extraneous movements of lifting and setting down the stylus need not be performed, and since maintaining contact between the stylus and the screen makes it easier in general to maintain more precise control over the location of contact by helping to stabilize the relationship between the stylus and the screen, Furthermore, in general it allows the displayed keyboard as a whole to be significantly reduced in size, since the path traced out by the user need not precisely contact each letter of the intended word. To the extent that the keyboard is not significantly reduced in size, speed of entry tends to be able to be correspondingly increased." (Paragraph [0028]).

Kushler also discloses that that the path traced out on the touch-screen by the user and recorded by the system for analysis is referred to as the input pattern. As the user traces out an input pattern on the touch screen, the system records the sequence of points of contact detected by the touch-screen controller hardware. As the input pattern is recorded, it is processes by an

input pattern analysis component. The input pattern analysis component extracts the data needed by the pattern matching component, which compares the extracted data with words in a database to identify a list of one or more words determined to be the most likely matching candidate words. One or more of these identified words are presented to the user for selection, and a selected word is added to the text being entered by the user. (Paragraph [0029], which is cited by the Final Action).

In addition, Kushler discloses that the text input system includes: a keyboard implemented on a touch-sensitive display screen, where the location of each displayed text character key is defined by the screen coordinates of the center of the key, which is the location used when determining the distance of the letter associated with the key from any point on the input pattern; a record of the input pattern consisting of the coordinate locations of the sequence of points of contact detected from the first location of contact through the location at which the stylus was lifted from the screen; a routine to analyze the input patterns to determine the locations associated with one or more inflection points of one or more types, and to calculate the distance between each determined location and the locations associated with text character keys; a database of words that can be entered using the system; a routine to determine which words most closely match the determined locations of inflection points; and a means to allow the user to select the desired word from the set of words determined to be the most likely matching candidates. (Paragraph [0030], printed lines 1-20, a portion of which is cited by the Final Action).

Kushler also discloses that the input pattern analysis component identifies up to five different types of inflection points in the input pattern: PEN_DOWN, the location where the stylus first makes contact with the touch screen; PEN_UP, the location where the stylus breaks contact with the touch-screen; ANGLE_THRESHOLD, a location where the sum of the absolute magnitudes of the x and y second order differences reaches a local maximum, having exceeded a pre-determined minimum threshold; ROW-CHANGE, a location between two successive inflection points of other types where the y-coordinate reaches a maximum (or minimum) value that occurs in a row of the keyboard positioned above (or below) the row(s) in which the two successive inflection points are located; and TAP, a location where the stylus is more or less

immediately lifted after contacting the screen, corresponding to the case of a one-letter word or the selection of a single function key. (Paragraph [0034]).

In addition, Kushler discloses that the words in the database are organized in a fashion to facilitate efficient searching by the pattern matching component. Since every input pattern has two easily and reliably identified inflection points – the first (PEN_DOWN) and the last (PEN_UP) – which are both always unambiguously matched with the first and last letters of the word being input, the words in the database are organized in groups according to the pair of keys which are associated [*sic*] the letters comprising the initial and final letter of each word. (Paragraph [0041], printed lines 1-10, where the Final Action cites Paragraphs [0041], [0042]).

2. Arguments

Currently amended, independent claims 1 and 8 recite in relevant part,

"recording a sequence of at least two tapped landing points on said keyboard, each of said sequence of at least two tapped landing points having a coordinate, and said sequence of at least two tapped landing points corresponding in a one-to-one manner to a sequence of correctly or incorrectly entered letters of a word, and a tapped space bar that delimits said word;

...

selecting all words of a lexicon having a number of letters equal to said number of correctly or incorrectly entered letters of a said word".

Similarly, currently amended, independent claim 15 recites in relevant part,

"a recorder configured to record a sequence of at least two tapped landing points on said keyboard, each of said sequence of at least two tapped landing points having a coordinate, and said sequence of at least two tapped landing points corresponding in a one-to-one manner to a sequence of correctly or incorrectly entered letters of a word, and a tapped space bar that delimits said word;

...

a selector module for selecting all words of a lexicon having a number of letters equal to said number of correctly or incorrectly entered letters of a said word".

Similarly, currently amended, independent claim 22 recites in relevant part,

"means for recording a sequence of tapped landing points on said keyboard, each of said sequence of tapped landing points having a coordinate, and said sequence of tapped landing points corresponding in a one-to-one manner to a sequence of correctly or incorrectly entered letters of a word, and a tapped word delimiter that delimits said word;

...

means for selecting all words of a lexicon having a number of letters equal to said number of correctly or incorrectly entered letters of a said word".

Kushler discloses that "[t]he system of the present invention allows the user to input a word of text without having to set the stylus down on the screen to contact an intended letter and then lift the stylus from the screen again before contacting the next letter – i.e., without having to "tap" each letter. [emphasis added]. (Paragraph [0028]).

Applicants respectfully submit that Kushler does not disclose, teach or suggest the present inventions features of: "recording a sequence of at least two tapped landing points on said keyboard, each of said sequence of at least two tapped landing points having a coordinate, and said sequence of at least two tapped landing points corresponding in a one-to-one manner to a sequence of correctly or incorrectly entered letters of a word, and a tapped space bar that delimits said word", as recited in currently amended, independent claim 1 and as similarly recited in currently amended, independent claim 8, 15, and 22, because Kushler teaches away from using "taps" to indicate letters.

Furthermore, the only occasion of a TAP in Kushler is for the recognition of a single letter word; whereas, the present invention, in currently amended, independent claims 1, 8, and 15, would use two taps, i.e., the single letter tap and the space bar tap, to indicate a single letter word and at least three taps to indicate multiple letter words.

Yet further, Applicants respectfully argue that the following plain meanings for the words, "tap", "tapped", and "tapping" are not analogous to the input pattern of a word of multiple letters consisting of the coordinate locations of the sequence of points (see also, "a continuous line that passes through or near the key of each letter in a word in sequence", Kushler, Abstract, 10 and 11) of contact detected from the first location of contact through the location at which the

stylus was lifted from the screen, as described by Kushler:

tap¹ (tap), v., **tapped**, **tapping**, n. -v.t. **1.** to strike with a light but audible blow or blows; hit with repeated, slight blows: *He tapped the door twice.* ... **3.** to strike (the fingers, a foot, a pencil, etc.) upon or against something, esp. with repeated light blows: *Stop tapping your feet!* ... **5.** to enter information or produce copy by tapping on a keyboard: *to tap data into a computer; to tap out a magazine article.* ... -v.i. **7.** to strike lightly but audibly, as to attract attention. **8.** to strike light blows Webster's New Universal Unabridged Dictionary, Barnes and Nobles Books, New York, 1996.

tap•ping¹ (tap'ing), n. **1.** the act of a person or thing that taps or strikes lightly. **2.** the sound produced by this. [1400-50; late ME; see TAP¹, -ING¹] Webster's New Universal Unabridged Dictionary, Barnes and Nobles Books, New York, 1996.

Applicants respectfully further argue that as "said sequence of tapped landing points corresponding in a one-to-one manner to a sequence of correctly or incorrectly entered letters of a word", as recited in currently amended, independent claim 22, describes a sequence of a plurality of letters correctly or incorrectly entered for a word, the word must necessarily comprise at least two letters corresponding to at least two tapped landing points and the tapped space bar that delimits the word.

In addition, Kushler describes that since every input pattern has two easily and reliably identified inflection points – the first (PEN_DOWN) and the last (PEN_UP) – which are both always unambiguously matched with the first and last letters of the word being input, the words in the database are organized in groups according to the pair of keys which are associated [*sic*] the letters comprising the initial and final letter of each word. Hence, Kushler could not correct the misspelled word "aoqputer", as shown in Fig. 8A of the Specification for the present invention, to the correctly spelled "computer, as shown in Fig. 8B of the Specification, because Kushler returns words from the database based on the initial and final letters.

In contrast, the present invention describes the feature of: "selecting all words of a lexicon having a number of letters equal to said number of correctly or incorrectly entered letters of a said word". (emphasis added). Therefore, the present invention can correctly recognize that a possible correct spelling for the misspelled "aoqputer" is, in fact, "computer". The present invention may allow ambiguity in the initial and final letter of an incorrectly entered word, because it relies upon a number of letters equal to the number of correctly or entered letters of the word to retrieve words from its lexicon.

For at least the reasons outlined above, Applicants respectfully submit that Kushler does not disclose, teach or suggest the present invention's features of: "recording a sequence of at least two tapped landing points on said keyboard, each of said sequence of at least two tapped landing points having a coordinate, and said sequence of at least two tapped landing points corresponding in a one-to-one manner to a sequence of correctly or incorrectly entered letters of a word, and a tapped space bar that delimits said word; ... selecting all words of a lexicon having a number of letters equal to said number of correctly or incorrectly entered letters of a said word", as recited in currently amended, independent claims 1 and 8, "a recorder configured to record a sequence of at least two tapped landing points on said keyboard, each of said sequence of at least two tapped landing points having a coordinate, and said sequence of at least two tapped landing points corresponding in a one-to-one manner to a sequence of correctly or incorrectly entered letters of a word, and a tapped space bar that delimits said word; ... a selector module for selecting all words of a lexicon having a number of letters equal to said number of correctly or incorrectly entered letters of a said word", as recited in currently amended, independent claim 15, and "means for recording a sequence of tapped landing points on said keyboard, each of said sequence of tapped landing points having a coordinate, and said sequence of tapped landing points corresponding in a one-to-one manner to a sequence of correctly or incorrectly entered letters of a word, and a tapped word delimiter that delimits said word; ... means for selecting all words of a lexicon having a number of letters equal to said number of correctly or incorrectly entered letters of a said word", as recited in currently amended, independent claim 22. Accordingly, Kushler does not anticipate, nor render obvious, the subject matter of currently amended, independent claims 1, 8, 15, and 22, and currently amended,

dependent claims 2-7, 9-14, and 16-21 under 35 U.S.C. §102(e). Withdrawal of the rejection of claims 1-22 under 35 U.S.C. §102(e) as anticipated by Kushler is respectfully solicited.

II. Formal Matters and Conclusion

Claims 1-22 are pending in the application.

Applicant respectfully submits that entry of currently amended claims 1-22 is proper because the currently amended claims will either place the application in condition for allowance or in better form for appeal.

With respect to the rejection of the claims over the prior art, Applicants respectfully argue that the currently amended claims are distinguishable over the cited prior art of record. Accordingly, the Examiner is respectfully requested to reconsider and withdraw the rejection to the claims.

In view of the foregoing, Applicants submit that claims 1-22, all the claims presently pending in the application, are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest time possible.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary.

Please charge any deficiencies and credit any overpayments to Attorney's Deposit Account Number 09-0441.

Respectfully submitted,

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